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**Date:** 8/22/2002 5:40:36 PM  
**Subject:** Radar Dectectors

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Jason Todd and I appreciate you, Karen and Hugh taking the time to meet with us on Tuesday, August 20, 2002 to discuss the impact on our mass retail members that the new regulation on the sale of radar detectors would impose.

Our members have multiple stores in all 50 states. Therefore, the labeling requirements as set forth in the regulation would be difficult to meet in the timetable allotted because it would require significant employee manhours to sort through the current stock of radar detectors to separate out the non-compliant radar detectors from the compliant stock. Furthermore, retailers would be at the mercy of the manufacturers to provide the labels immediately and to ensure that the labels could be distributed to all stores across the country in a timely fashion. Finally, labeling of the compliant radar detectors does not address the root issue here which is removing from the shelves and stopping further sales of the non-compliant detectors.

We believe that the idea of having retailers remove the non-compliant detectors from their shelves seems reasonable. We have asked our retailers to determine what their current stock is of radar detectors and how long it would take for them to sort and remove them from the store shelves. Once that information is compiled, our retailers may be receptive to this concept in exchange for a waiver from the labeling requirements.

We would like to pursue meeting with the Commissioners to discuss these options further.

Thank you.

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AUG 23 2002

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